ROHM AND HAAS COMPANY
PERFORMANCE POLYMERS BUSINESS
KANKAKEE PLANT

1400 HARVARD DRIVE, KANKAKEE IL 60901
815-933-8900

September 26, 2000

The Performance Track Information Center
c/o Industrial Economics Incorporated
2067 Massachusetts Avenue
Cambridge, MA. 02140

Re: Performance Track

Dear Sir:

Attached is the National Environmental Performance Track application and Rohm and Haas Kankakee Polymer Plant. We look forward to becoming part of this organization and would welcome any questions concerning the information in this application.

Very Truly Yours

Gary McFarlin

AOS-0035

National Environmental Achievement Track

Application Form

Rohm and Haas - Kankakee Polymer Plant
Name of facility

Rohm and Haas Company
Name of parent company (if any)

1400 Harvard Drive
Street address

Street address (continued)

Kankakee, Illinois 60901
City/State/Zip code

Give us information about your contact person for the National Environmental Achievement Track Program.

Name Gary McFarlin

Title Plant Manager

Phone 815-935-7713

Fax 815-933-2357

E-mail gmcfarli@rohmhaas.com

Section A

Tell us about your facility.

Why do we need this information?

EPA needs background information on your facility to evaluate your application.

What do you need to do?

- Provide background information on your facility.
- Identify your environmental requirements.

1 What do you do or make at your facility?

Manufacturer of water based (latex) emulsion polymers

2 List the Standard Industrial Classification (SIC) code(s) or North American Industrial Classification System (NAICS) codes that you use to classify business at your facility.

SIC
2821

NAICS

3 Does your company meet the Small Business Administration definition of a small business for your sector?

☐ Yes ☒ No

4 How many employees (full-time equivalents) currently work at your facility?

☐ Fewer than 50

☒ 50-99

☐ 100-499

☐ 500-1,000

☐ More than 1,000

5 Does your facility have an EPA ID number(s)?

If yes, list in the right-hand column.

☒ Yes ☐ No

RCRIS/EPA Facility ID	ILD984783977
TRIS	60901NCLCH1400H
AIRS ID	IL0818240
RMP	100000046087
NPDES	ILR005172

6 Identify the environmental requirements that apply to your facility. Use the Environmental Requirements Checklist, at the back of the instructions, as a reference. List your requirements to the right ***or*** enclose a completed Checklist with your application.

Checklist is Attached

7 Check the appropriate box in the right-hand column.

☐ I've listed the requirements above.

☒ I've enclosed the Checklist with my application.

8 Optional: Is there anything else you would like to tell us about your facility?

The Kankakee Facility is a very active in the local community and co-sponsors a local Community Advisory Panel. The plant also participates in the Responsible CARE Program and conducts self-assessments annually against the Code of Management Practice(s). Additionally, the Kankakee Plant has been a member of the Illinois "Partners in Pollution Prevention" program since 1995.

Section B

Tell us about your EMS.

Why do we need this information?

Facilities must have an operating Environmental Management System (EMS) that meets certain requirements.

What do you need to do?

- Confirm that your EMS meets the Achievement Track requirements.
- Tell us if you have completed a self-assessment or have had a third-party assessment of your EMS.

1 Check ***yes*** if your EMS meets the requirements for each element below as defined in the instructions.

a. Environmental policy ☒ Yes

b. Planning ☒ Yes

c. Implementation and operation ☒ Yes

d. Checking and corrective action ☒ Yes

e. Management review ☒ Yes

2 Have you completed at least one EMS cycle (plan-do-check-act)? ☒ Yes

3 Did this cycle include both an EMS and a compliance audit? ☒ Yes

4 Have you completed an objective self-assessment or third-party assessment of your EMS? ☒ Yes

If yes, what method of EMS assessment did you use?

☒ Self-assessment

☐ GEMI ☐ Other

☐ CEMP

☒ Third-party assessment

☐ ISO 14001 Certification

☒ Other

Section C

Tell us about your past achievements and future commitments.

Why do we need this information?

Facilities must show that they are committed to improving their environmental performance. This means that you can describe past achievements and will make future commitments.

What do you need to do?

Refer to the Environmental Performance Table in the instructions to answer questions 1 and 2.

1 Describe your past achievements for at least two environmental aspects. If you need more space than is provided, attach copies of this page.

Note to small facilities: If you qualify as a small facility as defined in the instructions, you are required to report past achievement for at least one environmental aspect.

First aspect you've selected

What aspect have you selected?	What was the previous level (2 years ago)?		What is the current level?	
	Quantity	Units	Quantity	Units
Waste to Air, Water, and Land from Disposal of Product	996903	LBS.	448624	LBS.

i. How is the current level an improvement over the previous level?

Increasing the product performance directly reduces the amount of waste generated. This data highlights the results of process improvement efforts for one of the products manufactured within the plant. The data represents improvements from the 1997-1999 time period. The benefit derived from this pollution prevention success story is a 548,279 Lb. absolute reduction in the amount of polymer sent to a pre-treatment plant. This improvement also reduced the amount of water sent to the POTW and the quantity of non-hazardous solids sent to the local landfill.

ii. How did you achieve this improvement?

This waste reduction success was the result of a planned effort to reduce the amount of waste generated from the manufacturing process. The plant made several significant changes to its manufacturing process which resulted in less waste materials being sent to the wastewater pre-treatment plant. The specific process changes are considered company confidential as they are specific to the batch manufacturing process.

Second aspect you've selected

What aspect have you selected?	What was the previous level (2 years ago)?		What is the current level?	
	Quantity	Units	Quantity	Units
Emissions of VOC's	422	LBS/YR	154	LBS/YR

i. How is the current level an improvement over the previous level?

The reduction of residual VOC's in the finished product produced at the plant has a direct affect on the facility VOC's. This change reflects the change in composition for one of the finished products, and quantifies the reduction of VOC's into the environment.

ii. How did you achieve this improvement?

The specific manufacturing changes employed to reduce the residual monomer in the finished product are considered company confidential and cannot be specifically discussed. In general, there were revisions made to the process chemistry and manufacturing methods, and did not result from major modifications to plant facilities or equipment.

2 Select at least four environmental aspects (no more than two from any one category) from the Environmental Performance Table in the instructions and then tell us about your future commitments. If you need more space than is provided, attach copies of this section.

Note to small facilities: If you are a small facility, you are required to make commitments for at least two environmental aspects in two different categories.

First aspect you've selected

a. What is the aspect? Total Solid Wastes

b. Is this aspect identified as significant in your EMS? ☒ Yes ☐ No

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

☒ Option A: Absolute value — 480 CY/YR (Quantity/Units)

☐ Option B: In terms of units of production or output — (Quantity/Units)

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

☒ Option A:
Absolute value — 20 CY/YR (Quantity/Units)

☐ Option B:
In terms of units of production or output — (Quantity/Units)

e. How will you achieve this improvement?

The plant will virtually eliminate the solid waste contribution from an organic peroxide (used in the manufacturing process). This improvement will be accompolished through the conversion to a bulk system and the reduction/elimination of small empty containers. The containers currently being used by the facility require disposal and cannot be recycled. This improvement is planned for 2001.

Second aspect you've selected

a. What is the aspect?

Hazardous Materials Use

b. Is this aspect identified as significant in your EMS?

☒ Yes ☐ No

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

☒ Option A:
Absolute value — 155,160 LBS/YR (Quantity/Units)

☐ Option B:
In terms of units of production or output — (Quantity/Units)

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

☒ Option A:
Absolute value — 0 LBS/YR (Quantity/Units)

☐ Option B:
In terms of units of production or output — (Quantity/Units)

e. How will you achieve this improvement?

The plant is committed to reducing the amount of hazardous materials used to treat process water. This change is expected to require the investment of capital, and if successful should eliminate the need for over 150,000 Lbs/Yr of hazardous chemicals (acid and base) required by the existing system. The change will occur within the next two years.

Third aspect you've selected

a. What is the aspect?

Total Water Use

b. Is this aspect identified as significant in your EMS?

☒ Yes ☐ No

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

☐ Option A: Absolute value

(Quantity/Units)

☒ Option B: In terms of units of production or output

0.06 GAL FLUSH/GAL. WATER
(Quantity/Units)

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

☐ Option A: Absolute value

(Quantity/Units)

☒ Option B: In terms of units of production or output

0.035 GAL. FLUSH/GAL. WATER
(Quantity/Units)

e. How will you achieve this improvement?

The existing water softener (plant utility system) is designed for manual back flushes and results in excess water used during certain parts of the cycle. This process will be made more efficient through the addition of new instrumentation and control logic. The plant will evaluate the potential solutions to this problem and will implement a more efficient back-flushing system within the next three years.

Fourth aspect you've selected

a. What is the aspect?

Total Energy Use

b. Is this aspect identified as significant in your EMS?

☐ Yes ☒ No

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

☒ Option A: Absolute value

500,000 BTU/YR
(Quantity/Units)

☐ Option B: In terms of units of production or output

(Quantity/Units)

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

☒ Option A: Absolute value

0 BTU/YR
(Quantity/Units)

☐ Option B: In terms of units of production or output

(Quantity/Units)

e. How will you achieve this improvement?

The plant will install the necessary piping and equipment to collect the condensate from a steam/process fluid heat exchanger. The installation of this energy recovery equipment will not only reduce energy usage as defined above, but will also reduce plant water and boiler chemical usage.

Section D

Tell us about your public outreach and reporting.

Why do we need this information?

Facilities must demonstrate their commitment to public outreach and performance reporting. You should have appropriate mechanisms in place to identify community concerns, to communicate with the public, and to provide information on your environmental performance.

What do you need to do?

- Describe your approach to public outreach.
- List three references who are familiar with your facility.

1 How do you identify and respond to community concerns?

The Kankakee Plant sponsors a Community Advisory Panel (CAP) which is used extensively to identify community concerns. This group routinely meets with plant management personnel and is routinely used to understand how the Rohm and Haas Facility can continue to be an asset to the local community.

In addition, the plant has held periodic open houses for both near neighbors and the general public to solicit ideas and foster good community relations. Two such events have been held since 1991. In the specific area of emergency response, the plant has been a strong supporter of the local LEPC and has had an employee on the committee since the start-up of the plant in 1991. To be successful in this area, the plant has always maintained strong personal relationships with near neighbors, local regulatory officials, and local emergency responders.

2 How do you inform community members of important matters that affect them?

This communication is done through a variety of means. The primary way important community matters are communicated is through the local CAP. The CAP consists of neighbors, community responders, and other individuals from throughout the community, and as a group provide a good forum for information sharing. They also provide guidance on when, and how best to communicate issues with the general community. The most recent example of a community communication is RMP, in which separate presentations were made to the CAP, community responders, the LEPC, and finally a general presentation was advertised in the newspaper and subsequently made to the general public. In this instance, the first presentation was made with the CAP, and they provided input in how best to reach the community as a whole.

The plant has also developed brochures which have been distributed to neighbors and concerned citizens within the community. This brochure was developed to communicate important information about the plant (type of facility, plant phone numbers, hours of operation, manufactured products, etc.) to anyone out in the community. These have been made available community members during open houses and numerous other public events.

3 How will you make the Achievement Track Annual Performance Report available to the public?

☐ Website www.

☐ Newspaper

☐ Open Houses

☒ Other

The Achievement Track Annual Preformance Report will be presented annually to the CAP Additionally, the report will be made available to the public upon request. CAR 11/17/00

4 Are there any ongoing citizen suits against your facility?

☐ Yes ☒ No

If yes, describe briefly in the right-hand column.

5 List references below

	Organization	*Name*	*Phone number*
Representative of a Community/ Citizen Group	Kankakee Area CAP	Charlene Dybedock	815-937-0406
State/Local Regulator	Kankakee METRO	Richard Schultz	815-933-0487
Other community/local reference	Kankakee Area CAP and near neighbor.	Craig Copper	815-937-2019

Section E

Application and Participation Statement

On behalf of Rohm and Haas Kankakee Polymer Plant [my facility],

I certify that

- I have read and agree to the terms and conditions, as specified in the *National Environmental Achievement Track Program Description* and in the *Application Instructions*;
- I have personally examined and am familiar with the information contained in this Application (including, if attached, the Environmental Requirements Checklist). The information contained in this Application is, to the best of my knowledge and based on reasonable inquiry, true, accurate, and complete, and I have no reason to believe the facility would not meet all program requirements;
- My facility has an environmental management system (EMS), as defined in the Achievement Track EMS requirements, including systems to maintain compliance with all applicable federal, state, tribal, and local environmental requirements, in place at the facility, and the EMS will be maintained for the duration of the facility's participation in the program;
- My facility has conducted an objective assessment of its compliance with all applicable federal, state, tribal, and local environmental requirements, and the facility has corrected all identified instances of potential or actual noncompliance;
- Based on the foregoing compliance assessment and subsequent corrective actions (if any were necessary), my facility is, to the best of my knowledge and based on reasonable inquiry, currently in compliance with applicable federal, state, tribal, and local environmental requirements.

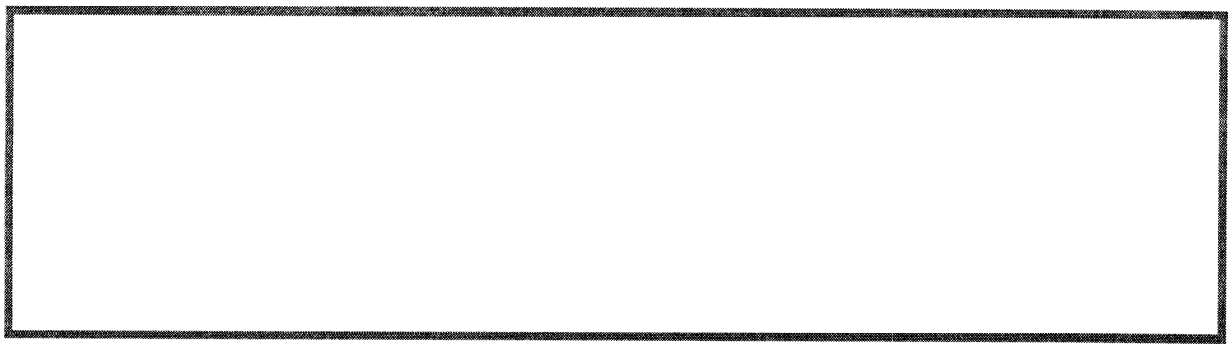
I agree that EPA's decision whether to accept participants into or remove them from the National Environmental Achievement Track is wholly discretionary, and I waive any right that may exist under any law to challenge EPA's acceptance or removal decision.

I am the senior facility manager and fully authorized to execute this statement on behalf of the corporation or other legal entity whose facility is applying to this program.

Signature/Date	Gary McFarlin 9/27/00
Printed Name/Title	Gary McFarlin Plant Manager
Facility Name	Rohm and Haas - Kankakee Polymer Plant
Facility Street Address	1400 Harvard Drive
Facility ID Numbers	RCRIS/EPA Facility ID ILD984783977 TRIS 60901NCLCH1400H AIRS ID IL0818240 RMP 100000046087 NPDES ILR005172

gency program. Please direct inquiries to 1-888-339-PTRK or e-mail rack@indecon.com. Mail completed applications to:

The Performance Track Information Center
c/o Industrial Economics Incorporated
2067 Massachusetts Avenue
Cambridge, MA 02140



National Environmental Achievement Track

Environmental Requirements Checklist

The following Checklist is provided to assist facilities in answering Section A, "Tell us about your facility," Question 6. The Checklist is given to help facilities identify the major federal, state, tribal, and local environmental requirements applicable at their facilities. The Checklist is not intended to be an exhaustive list of all environmental requirements that may be applicable at an individual facility.

If you use this Checklist and choose to submit it with your application, fill in your facility information below and enclose the completed Checklist with your application (see instructions).

Facility Name	Rohm and Haas - Kankakee Polymer Plant
Facility Location:	1400 Harvard Drive, Kankakee, Illinois 60901
Facility ID Number(s):	RCRIS/EPA Facility ID ILD984783977
(attach additional sheets	TRIS 60901NCLCH1400H AIRS ID IL0818240
if necessary)	RMP 100000046087 NPDES ILR005172

Air Pollution Regulations

		Check All That Apply
1.	National Emission Standards for Hazardous Air Pollutants (40 CFR 61)	☒
2.	Permits and Registration of Air Pollution Sources	☒
3.	General Emission Standards, Prohibitions and Restrictions	☒
4.	Control of Incinerators	☐
5.	Process Industry Emission Standards	☐
6.	Control of Fuel Burning Equipment	☐
7.	Control of VOCs	☒
8.	Sampling, Testing and Reporting	☐
9.	Visible Emissions Standards	☒
10.	Control of Fugitive Dust	☐
11.	Toxic Air Pollutants Control	☒
12.	Vehicle Emissions Inspections and Testing	☐
	Other Federal, State, Tribal or Local Air Pollution Regulations Not Listed Above (identify)	
13.	Risk Management Plan	☒
14.		☐

Hazardous Waste Management Regulations

1.	Identification and Listing of Hazardous Waste (40 CFR 261)	
	- Characteristic Waste	☒
	- Listed Waste	☐

2. Standards Applicable to Generators of Hazardous Waste (40 CFR 262)
   - Manifesting ☒
   - Pre-transport requirements ☒
   - Record keeping/reporting ☒
3. Standards Applicable to Transporters of Hazardous Waste (40 CFR 263)
   - Transfer facility requirements ☐
   - Manifest system and record-keeping ☐
   - Hazardous waste discharges ☐
4. Standards for Owners and Operators of TSD Facilities (40 CFR 264)
   - General facility standards ☐
   - Preparedness and prevention ☐
   - Contingency plan and emergency procedures ☐
   - Manifest system, Record keeping and reporting ☐
   - Groundwater protection ☐
   - Financial requirements ☐
   - Use and management of containers ☐
   - Tanks ☐
   - Waste piles ☐
   - Land treatment ☐
   - Incinerators ☐
5. Interim Status Standards for TSD Owners and Operators (40 CFR 265) ☐
6. Interim Standards for Owners and Operators of New Hazardous Waste Land Disposal Facilities (40 CFR 267) ☐
7. Administered Permit Program (Part B) (40 CFR 270) ☐

Other Federal, State, Tribal or Local Hazardous Waste Management Regulations Not Listed Above (identify)

8. ☐
9. ☐

Hazardous Materials Management

1. Control of Pollution by Oil and Hazardous Substances (33 CFR 153) ☐
2. Designation of Reportable Quantities and Notification of Hazardous Materials Spill (40 CFR 302) ☒
3. Hazardous Materials Transportation Regulations (49 CFR 172-173) ☒
4. Worker Right-to-Know Regulations (29 CFR 1910.1200) ☒
5. Community Right-to-Know Regulations (40 CFR 350-372) ☒

Other Federal, State, Tribal or Local Hazardous Materials Management Regulations Not Listed Above (identify)

6. ☐
7. ☐

Solid Waste Management

1. Criteria for Classification of Solid Waste Disposal Facilities and Practices (40 CFR 257) ☐
2. Permit Requirements for Solid Waste Disposal Facilities ☐
3. Installation of Systems of Refuse Disposal ☐
4. Solid Waste Storage and Removal Requirements ☐
5. Disposal Requirements for Special Wastes ☐

Other Federal, State, Tribal or Local Solid Waste Management Regulations Not Listed Above (identify)

6. ☐
7. ☐

Water Pollution Control Requirements

1. Oil Spill Prevention Control and Countermeasures (SPCC) (40 CFR 112) ☐
2. Designation of Hazardous Substances (40 CFR 116) ☒
3. Determination of Reportable Quantities for Hazardous Substances (40 CFR 117) ☒
4. NPDES Permit Requirements (40 CFR 122) ☒
5. Toxic Pollutant Effluent Standards (40 CFR 129) ☐
6. General Pretreatment Regulations for Existing and New Sources (40 CFR 403) ☒
7. Organic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 414) ☐
8. Inorganic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 415) ☐
9. Plastics and Synthetics Point Source Effluent Guidelines and Standards (40 CFR 416) ☐
10. Water Quality Standards ☐
11. Effluent Limitations for Direct Dischargers ☐
12. Permit Monitoring/Reporting Requirements ☒
13. Classifications and Certifications of Operators and Superintendents of Industrial Wastewater Plants ☒
14. Collection, Handling, Processing of Sewage Sludge ☐
15. Oil Discharge Containment, Control and Cleanup ☐
16. Standards Applicable to Indirect Discharges (Pretreatment) ☒

Other Federal, State, Tribal or Local Water Pollution Control Regulations Not Listed Above (identify)

17. ☐
18. ☐

Drinking Water Regulations

1. Underground Injection and Control Regulations, Crieria and Standards (40 CFR 144, 146) ☐

2. National Primary Drinking Water Standards (40 CFR 141) ☐
3. Community Water Systems, Monitoring and Reporting Requirements (40 CFR 141) ☐
4. Permit Requirements for Appropriation/Use of Water from Surface or Subsurface Sources ☐
5. Underground Injection Control Requirements ☐
6. Monitoring, Reporting and Record keeping Requirements for Community Water Systems ☐

Other Federal, State, Tribal or Local Drinking Water Regulations Not Listed Above(identify)

7. ☐
8. ☐

Toxic Substances

1. Manufacture and Import of Chemicals, Record keeping and Reporting Requirements (40 CFR 704) ☐
2. Import and Export of Chemicals (40 CFR 707) ☐
3. Chemical Substances Inventory Reporting Requirements (40 CFR 710) ☒
4. Chemical Information Rules (40 CFR 712) ☒
5. Health and Safety Data Reporting (40 CFR 716) ☒
6. Pre-Manufacture Notifications (40 CFR 720) ☐
7. PCB Distribution Use, Storage and Disposal (40 CFR 761) ☐
8. Regulations on Use of Fully Halogenated Chlorofluoroalkanes (40 CFR 762) ☐
9. Storage and Disposal of Waste Material Containing TCDD (40 CFR 775) ☐

Other Federal, State, Tribal or Local Toxic Substances Regulations Not Listed Above (identify)

10. ☐
11. ☐

Pesticide Regulations

1. FIFRA Pesticide Use Classification (40 CFR 162) ☐
2. Procedures for Disposal and Storage of Pesticides and Containers (40 CFR 165) ☐
3. Certification of Pesticide Applications (40 CFR 171) ☐
4. Pesticide Licensing Requirements ☐
5. Labeling of Pesticides ☐
6. Pesticide Sales, Permits, Records, Application and Disposal Requirements ☐
7. Disposal of Pesticide Containers ☐
8. Restricted Use and Prohibited Pesticides ☐

Other Federal, State, Tribal or Local Pesticides Regulations Not Listed Above (identify)

9. ☐
10. ☐

Environmental Clean-Up, Restoration, Corrective Action

1. Comprehensive Environmental Response, Compensation and Liability Act (Superfund) (identify) ☐

2. RCRA Corrective Action (identify) ☐

Other Federal, State, Tribal or Local Environmental Clean-Up, Restoration, Corrective Action Regulations Not Listed Above (identify)

3. ☐
4. ☐